

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI**

**In re:**

**Noble Health Real Estate LLC,**

**Debtor.**

Case # 23-20051-11

**DEBTOR'S RESPONSE TO  
UNITED STATES TRUSTEE'S MOTION TO DISMISS**

**COMES NOW** Noble Health Real Estate LLC, Debtor herein, and for its response to the United States Trustee's Motion to Dismiss states:

1. On February 10, 2023, Noble Health Real Estate LLC (Debtor) filed this Chapter 11 proceeding.
2. On May 30, 2024, the Debtor's Third Amended Chapter 11 Plan was confirmed.
3. On February 7, 2025, the United States Trustee filed his Motion to Dismiss, alleging various post-confirmation defaults. The Debtor agrees that the defaults alleged to have occurred, and that it currently does not have the ability to cure the defaults, and therefore consents to dismissal of this Chapter 11 case.

**WHEREFORE**, having responded to the United States Trustees Motion to Dismiss, the Debtor agrees that the Chapter 11 proceeding herein be dismissed.

**Respectfully submitted,  
BERMAN, DeLEVE, KUCHAN & CHAPMAN, LLC**

**By: /s/ Ronald S. Weiss**

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DEBTOR-IN-POSSESSION**

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that the foregoing Notice was filed electronically with the Clerk of the Bankruptcy Court on the 3<sup>rd</sup> day of March 2025 and was served electronically on those parties receiving electronic notice through the Court's CM/ECF system.

/s/ **Ronald S. Weiss**

Ronald S. Weiss, MO #21215

**ATTORNEY FOR DEBTOR and  
DEBTOR-IN-POSSESSION**